

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	
)	NO. 99-17083
Diane Deaderick)	
)	Chapter 7
Debtor,)	
)	
)	Chief Judge Bruce W. Black
)	

NOTICE OF MOTION

TO: Diane Deaderick, c/o Sulaiman Law Group, Ltd. ATTN: Mohammed O. Badwan, 900 Jorie Boulevard, Suite 150, Oak Brook, IL 60523
Patrick S. Layng, Office of the United States Trustee
David R. Herzog, Chapter 7 Trustee

PLEASE TAKE NOTICE that on May 25, 2016 at 10:00 a.m., the undersigned will appear before the Honorable Bruce W. Black at the Dirksen Federal Courthouse, Court room 719, 219 S. Dearborn Street, Chicago, IL 60604, and will then and there present the attached Motion for Enlargement of Time to Respond to Debtor's Motion Pursuant to 11 U.S.C. §§ 524, 105 For Violations of the Discharge Injunction and Fed. R. Bankr. P. 9020 Seeking Sanctions For Civil Contempt against Contract Callers, Inc. at which time you may appear if you so choose.

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2016, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will provide notice to all counsel of record.

/s/ Nicole M. Strickler
Nicole M. Strickler
Messer, Stilp & Strickler Ltd.
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)	NO. 99-17083
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**MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH CONTRACT CALLERS, INC.
MUST FILE A RESPONSE TO DEBTOR’S MOTION FOR VIOLATIONS OF THE
DISCHARGE INJUNCTION AND SEEKING SANCTIONS FOR CIVIL CONTEMPT**

Contract Callers, Inc. (“Contract Callers”), by counsel, hereby requests an extension of the deadline to file a response to Diane Deaderick’s (“Debtor”) Motion Pursuant to 11 U.S.C. §§ 524, 105 For Violations of the Discharge Injunction and Fed. R. Bankr. P. 9020 Seeking Sanctions For Civil Contempt against Contract Callers, Inc., and in support thereof states as follows:

1. On May 9, 2016, Debtor filed her Motion Pursuant to 11 U.S.C. §§ 524, 105 For Violations of the Discharge Injunction and Fed. R. Bankr. P. 9020 Seeking Sanctions For Civil Contempt against Contract Callers, Inc. (hereinafter “Motion”).
2. Contract Callers did not receive a copy of the Motion until May 16, 2016.
3. Under Fed. R. Bankr. P. 9006(d), Contract Caller’s response is due no later than May 24, 2016.
4. On March 23, 2015, Debtor filed a civil complaint against Contract Callers in the Northern District of Illinois for violations of the Telephone Consumer Protection Act (“TCPA”), the Fair Credit Reporting Act (“FCRA”), violations of the Bankruptcy Discharge Injunction, and

the Illinois Consumer Fraud and Deceptive Practices Act (“ICFA”). The matter is styled Diane Deaderick v. Contract Callers, Inc., 15-cv-02508 (hereinafter the “District Court Lawsuit”).

5. The District Court Lawsuit is still pending before the Honorable Judge Manish Shah.

6. It is Debtor’s intention to withdraw the reference to the bankruptcy court for her claim for violations of the Discharge Injunction so that it can be resolved in the District Court Lawsuit, along with her other claims, which are based on the same purported collection efforts.

7. Contract Callers reasonably requests that the deadline to file its response be extended until at least 21 days or until June 14, 2016.

WHEREFORE, Contract Callers, Inc. hereby requests enlargement of time to file response to Debtor’s Motion in the above matter to and including June 14, 2016.

Respectfully submitted,

Date: May 18, 2016

By: /s/ Nicole M. Strickler
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